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14  
15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18  
19 MAFFICK LLC, a Delaware limited liability  
company,

20 Plaintiff,

21 vs.

22 FACEBOOK, INC., a Delaware corporation,  
23 and Does 1-10, inclusive.

24 Defendants.

Case No. 3:20-cv-05222-JD

**DECLARATION OF JONATHAN H.  
BLAVIN IN SUPPORT OF FACEBOOK,  
INC.'S OPPOSITION TO PLAINTIFF'S  
EX PARTE APPLICATION FOR A  
TEMPORARY RESTRAINING ORDER  
AND ORDER TO SHOW CAUSE RE  
PRELIMINARY INJUNCTION**

**DECLARATION OF JONATHAN H. BLAVIN**

I, Jonathan H. Blavin, declare as follows:

1. I am an attorney in the law firm of Munger, Tolles & Olson LLP, counsel of record for Defendant Facebook, Inc. (“Facebook”) in the above-captioned matter. I have personal knowledge of the facts stated in this declaration and could competently testify to them if called upon to do so. I make this declaration in support of Facebook’s Opposition to Plaintiff Maffick LLC’s *Ex Parte* Application for a Temporary Restraining Order and Order to Show Cause re Preliminary Injunction.

2. Attached hereto as **Exhibit A** is a true and correct copy of the article titled *Russia is backing a viral video company aimed at American millennials*, dated February 15, 2019, as downloaded by my law firm from <https://www.cnn.com/2019/02/15/tech/russia-facebook-viral-videos/index.html>.

3. Attached hereto as **Exhibit B** is a true and correct copy of a July 30, 2020 tweet from the Twitter account @inthenow, as downloaded by my law firm from <https://twitter.com/inthenow/status/1288806591052079108> on August 2, 2020.

4. Attached hereto as **Exhibit C** is a true and correct copy of a report titled *Russian Active Measures Campaigns and Interference in the 2016 U.S. Election – Volume 2: Russia’s Use of Social Media with Additional Views*, from the U.S. Senate Select Committee on Intelligence, as downloaded by my law firm from [https://www.intelligence.senate.gov/sites/default/files/documents/Report\\_Volume2.pdf](https://www.intelligence.senate.gov/sites/default/files/documents/Report_Volume2.pdf).

5. Attached hereto as **Exhibit D** is a true and correct copy of the article titled *Russia’s Network of Millennial Media*, dated February 15, 2019, as downloaded by my law firm from <https://securingdemocracy.gmfus.org/russias-network-of-millennial-media/>.

6. Attached hereto as **Exhibit E** is a true and correct copy of the article titled *Russia’s RT attacks Facebook for suspending 4 viral news channels that broadcast Kremlin talking points to millennials*, dated February 18, 2019, as downloaded by my law firm from <https://www.businessinsider.com/rt-attacks-facebook-for-suspending-in-the-now-soapbox-other-pages-2019-2>.

1           7.       Attached hereto as **Exhibit F** is a true and correct copy of the article titled *Russia's*  
2 *RT Slams Facebook For Suspending Anti-US, Pro-Kremlin Viral Video Channels*, dated February  
3 18, 2019, as downloaded by my law firm from [https://www.ibtimes.com/russias-rt-slams-](https://www.ibtimes.com/russias-rt-slams-facebook-suspending-anti-us-pro-kremlin-viral-video-channels-2765394)  
4 [facebook-suspending-anti-us-pro-kremlin-viral-video-channels-2765394](https://www.ibtimes.com/russias-rt-slams-facebook-suspending-anti-us-pro-kremlin-viral-video-channels-2765394).

5           8.       Attached hereto as **Exhibit G** is a true and correct copy of the archived webpage  
6 maffick.media, dated February 18, 2019, as downloaded by my law firm from  
7 <https://web.archive.org> on August 2, 2020.

8           9.       Attached hereto as **Exhibit H** is a true and correct copy of the article *Facebook*  
9 *restores previously suspended Russia-linked pages*, dated February 25, 2019, as downloaded by  
10 my law firm from [https://thehill.com/policy/technology/431497-facebook-restores-previously-](https://thehill.com/policy/technology/431497-facebook-restores-previously-suspended-russia-linked-pages)  
11 [suspended-russia-linked-pages](https://thehill.com/policy/technology/431497-facebook-restores-previously-suspended-russia-linked-pages).

12           10.      Attached hereto as **Exhibit I** is a true and correct copy of Anissa Naouai's  
13 LinkedIn profile, dated February 11, 2011, as downloaded by my law firm from  
14 [http://web.archive.org/web/20110211122903/https://www.linkedin.com/pub/anissa-](http://web.archive.org/web/20110211122903/https://www.linkedin.com/pub/anissa-naouai/8/825/a3)  
15 [naouai/8/825/a3](http://web.archive.org/web/20110211122903/https://www.linkedin.com/pub/anissa-naouai/8/825/a3).

16           11.      Attached hereto as **Exhibit J** are true and correct copies of the About sections from  
17 the Facebook Pages titled In the NOW, Waste-Ed, and Soapbox, as downloaded by my law firm  
18 from <https://www.facebook.com/pg/inthenow/about/>,  
19 <https://www.facebook.com/pg/GoWasteEd/about/>, and  
20 <https://www.facebook.com/pg/SoapboxStand/about/> respectively on August 2, 2020.

21           12.      Attached hereto as **Exhibit K** is a true and correct copy of the domain name  
22 registration data lookup result from the website <https://lookup.icann.org/lookup> for the domain  
23 name maffick.media, as downloaded by my law firm on August 2, 2020.

24           13.      Attached hereto as **Exhibit L** is a true and correct copy of the About section of the  
25 website [euvdisinfo.eu](https://euvdisinfo.eu), as downloaded by my law firm from <https://euvdisinfo.eu/about/> on  
26 August 2, 2020.

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